

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
ROD PETERSON, a/k/a IMAM FAHIEM H. HAQQ,

Plaintiff,

-against-

NEW YORK CITY POLICE DEPARTMENT and THE
CITY OF NEW YORK, PORT AUTHORITY BRIDGES
AND TUNNELS, EDDIE CRESPO-transportation police
officer, ALBERT MELENDEZ, Bridge & tunnel
employee officer,

Defendants.
-----X

**DEFENDANT'S NOTICE
OF MOTION TO DISMISS**

CV 11-808 (JG)(VVP)

PLEASE TAKE NOTICE that upon the Declaration of Megan Lee and the exhibits annexed thereto, and the accompanying Memorandum of Law, and upon all prior pleadings and proceedings had herein, Defendant The Port Authority of New York and New Jersey, (s/h/a Port Authority Bridges and Tunnels) by its attorney, James M. Begley, will move before the Honorable John Gleeson, at the United States District Court for the Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York, on Friday, May 29, 2011, or at a date and time set by the Court, for dismissal pursuant to Fed.R.Civ.P. 12(b)(6), and for such other and further relief as this Court deems just and proper.

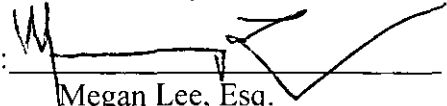
PLEASE TAKE FURTHER NOTICE that answering papers, if any, must be served on the undersigned on or before May 3, 2011.

PLEASE TAKE FURTHER NOTICE that reply papers, if any, shall be served on or before May 10, 2011.

Dated: New York, New York
April 18, 2011

Respectfully yours,

JAMES M. BEGLEY, ESQ.
Attorney of Record for Defendant
The Port Authority of New York & New Jersey

By: 
Megan Lee, Esq.
225 Park Ave South, 13th Floor
New York, New York 10003
(212) 435-3435

TO: Rod Peterson, pro se
P.O. Box 341264
Jamaica, NY 11434

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
ROD PETERSON, a/k/a IMAM FAHIEM H. HAQQ,

Plaintiff,

AFFIDAVIT OF SERVICE

-against-

CV 11-808 (JG)(VVP)

NEW YORK CITY POLICE DEPARTMENT and THE
CITY OF NEW YORK, PORT AUTHORITY BRIDGES
AND TUNNELS, EDDIE CRESPO-transportation police
officer, ALBERT MELENDEZ, Bridge & tunnel
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Defendants.
-----X

STATE OF NEW YORK)
)ss.:
COUNTY OF NEW YORK)

GEORGINA K. GOMEZ, being duly sworn, deposes and says:

That I am a staff member in the office of James M. Begley, attorney for the defendant, The Port Authority of New York and New Jersey, 225 Park Avenue South, 13th Floor, New York, New York, am not a party to this action, and am over the age of eighteen (18) years.

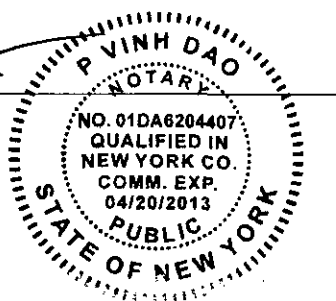
That on the 18th day of April, 2011, I served the annexed **NOTICE OF MOTION, DECLARATION IN SUPPORT, MEMORANDUM OF LAW, and RULE 12.1 NOTICE TO PRO SE LITIGANT** upon:

Rod Peterson
P.O. Box 341264
Jamaica, New York 11434

By Federal Express by bringing a true copy thereof, securely enclosed in an addressed, sealed Federal Express wrapper to the Federal Express Dropbox located at 225 Park Avenue South, New York, New York, which is designated to receive outgoing Federal Express materials.

Sworn to before me this
18th day of April, 2011

Notary Public



Georgina Gomez

A handwritten signature of Georgina Gomez in black ink, written over a horizontal line.

THE PORT AUTHORITY OF NY & NJ

*Darrell Buchbinder, General Counsel
Christopher M. Hartwyk, First Deputy General Counsel*

April 18, 2011

VIA FEDERAL EXPRESS

Rod Peterson
P.O. Box 341264
Jamaica, New York 11434

**Re: Rod Peterson v. The Port Authority of New York and New Jersey, et al.
CV 11-808 (JG) (VVP)**

Dear Mr. Peterson:

In regard to the above-captioned matter, enclosed please find the following:

- Defendant's Notice of Motion to Dismiss
- Declaration in Support of Motion to Dismiss
- Memorandum of Law on Behalf of Defendant The Port Authority of New York and New Jersey in Support of its Motion to Dismiss
- Rule 12.1 Notice to Pro Se Litigant of Motion to Dismiss

Said documents are being filed with the court today. If you should have any questions, please do not hesitate to contact me.

Very truly yours,



Matthew Peterson, Esq.
Direct Dial (212) 435-3442

MP:gkg

225 Park Avenue South
New York, NY 10003

From: (212) 435-3442
 Matthew L. Peterson, Esq.
 Port Authority of NY & NJ
 225 Park Avenue South, 13th Floor
 New York, NY 10003

Origin ID: MGJA



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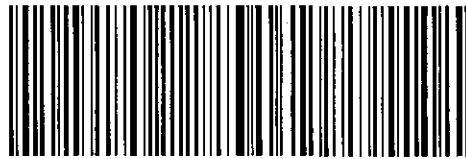
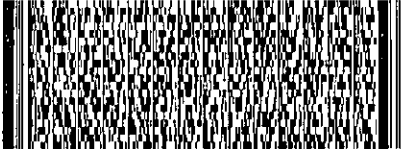
TUE - 19 APR A1
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